

September 21, 2015

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554



Re: Promoting Innovation and Competition in the Provision of Multichannel Video Programming Distribution Services (DN 14-261)

Dear Ms Dortch,

We are concerned about the impact the proposed rulemaking (DN 14-261) will have on our organization and our ability to provide Public, Educational and Government (PEG) Access services to our community. We strongly support the comments and reply comments of the community media centers and NATOA along with others who have expressed similar concerns in this proceeding.

WKTV opened its doors to providing PEG services 41 years ago and we are particularly concerned about the rulemaking's proposal to classify over-the-top (OTT) video services provided by cable franchise holders as something other than a "cable service." Such a designation would allow cable franchise holders to undercut their public interest obligations.

We believe that OTT should be treated in a manner similar as to how Comcast proposes to treat its new Internet streaming video service – Stream; namely, as an IP cable service, subject to franchise fees and important public interest obligations. We also greatly support that MVPD classification not be made optional.

A decline in PEG fees would severely cripple our ability to continue to offer the valuable services to the communities we serve. WKTV operates three local channels, public, educational and governmental and program with tens of thousands of hours of local programming created by community members who donated over 13,000 hours of time to create this media.

Vital to WKTV's mission is the coverage of city and county meetings which assists greatly in local government transparency along with debates for local and state

offices and a great deal of “how-to” programming along with a wide array of educational programming.

All of this public interest work will be jeopardized if current levels of Franchise and PEG fees are not protected.

If PEG funding goes away our communities will lose the most powerful peoples voice they’ve ever had. The thousands of small nonprofit agencies in our area will lose the main means they have developed to spread the word of their services and mission.

We ask the Commission not to diminish these vital PEG public interest requirements as it considers this proposed rulemaking.

Respectfully,

A handwritten signature in black ink, appearing to read "Tom Norton", with a long horizontal flourish extending to the right.

Tom Norton  
General Manager, WKTV Community Media